



Wright, Constable & Skeen, L.L.P. Attorneys at Law

One Charles Center, 16th Floor • 100 North Charles Street • Baltimore, Maryland 21201-3812 • 410-659-1300 • Fax 410-659-1350

FILED  
U.S. DISTRICT COURT  
2002 MAR 15 P 2:11  
March 14, 2002

WRITER'S DIRECT DIAL/E-MAIL:  
410-659-1304/SWhite@wcslaw.com

Douglas G. Worrall  
Michael J. Abromaitis  
Monte Fried  
James W. Constable  
David W. Skeen  
Robert W. Hesselbacher, Jr. \*\*  
James D. Skeen\*  
Kenneth F. Davies  
Stephen F. White  
Lois Fenner McBride  
Frederick L. Kobb  
Paul F. Evelius  
Mary Alice Smolarek\*

Associates

Michael A. Stanley  
Howard S. Stevens\*  
Victoria August  
Joy K. Sakellaris  
W. Jay Lee

Of Counsel

Francis N. Iglehart  
P. McEvoy Cromwell

Wm. P. Constable (1882-1976)  
John D. Wright (1903-1976)

Towson Office

307 West Allegheny Avenue  
Towson, Maryland 21204-4258  
Phone 410-825-0750  
Fax 410-825-0715

www.wcslaw.com

The Honorable J. Frederick Motz  
United States District Judge  
U.S. Court House  
101 W. Lombard Street  
Baltimore, Maryland 21201

Re: Liberty Marina v. American Alliance Ins. Co.  
U.S. District Court for the District of Maryland  
Civil Action No. JFM-01-2016  
Our File No.: 6313-14

Dear Judge Motz:

I am writing to present a joint request for modification of the Scheduling Order in the above case.

The plaintiff's expert designation deadline (Rule 26(a)(2)) was February 7, 2002. Soon after receiving the plaintiff's designation, the defendant requested a date to depose the plaintiff's expert. Unfortunately, the earliest date we could depose the plaintiff's expert is April 5, 2002. The defendant's expert designation deadline is March 18, 2002. Therefore, the deposition could not be taken before the current deadline.

This has been discussed between counsel (myself and Michael Wiggins, Esq.). We have jointly agreed to request that the Schedule be modified as follows. This would not affect the current Discovery Deadline or the current Motions Deadline:

Defendant's Rule 26(a)(2)	from 3/18/02 to 4/19/02
Plaintiff's Rebuttal 26(a)(2)	from 4/01/02 to 5/03/02
Rule 26(e) Supplementation	from 4/15/02 to 5/17/02
Discovery Deadline	unchanged 6/01/02
Dispositive Motions	unchanged 7/01/02

119220 v. (06313.00014)

\* Admitted in the District of Columbia and Maryland

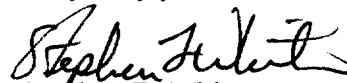
\*\* Admitted in the District of Columbia, Maryland and Virginia


15  
JF

Honorable J. Frederick Motz.  
March 14, 2002  
Page 2

Your consideration of this joint request is greatly appreciated.

Very truly yours,

  
Stephen F. White

Approved/~~Denied~~: 

Dated: March 15, 2002

cc:

Michael Wiggins, Esq.  
Wharton, Levin, Ehrmantraut, Klein & Nash  
104 West Street  
Annapolis, MD 21404

(410) 280-2230 Fax